

**To:** Brown, Anthony R (RM)[anthony.brown@bp.com]  
**Cc:** Barton, Dana[Barton.Dana@epa.gov]; Black, Ned[Black.Ned@epa.gov]; Cory Koger[Cory.S.Koger@usace.army.mil]; Darrel Cruz 2[Darrel.Cruz@washoetribe.us]; David Friedman[dfriedman@ndep.nv.gov]; Doug Carey[douglas.carey@waterboards.ca.gov]; Fred K[fredk@aeseinc.com]; Riley, Gary[riley.gary@epa.gov]; Greg Reller[gr@burlesonconsulting.com]; Wirtschafter, Joshua[Wirtschafter.Joshua@epa.gov]; Ken Maas[kmaas@fs.fed.us]; Lombardi, Marc (marc.lombardi@amecfw.com)[marc.lombardi@amecfw.com]; Michelle Hochrein[michelle.hochrein@washoetribe.us]; Patty Cubanski[pc@burlesonconsulting.com]; Sanchez, Yolanda[Sanchez.Yolanda@epa.gov]; Serda, Sophia[Serda.Sophia@epa.gov]; Shaffer, Caleb[Shaffer.Caleb@epa.gov]; Steve Hampton[Steve.Hampton@wildlife.ca.gov]; Thomas Maurer[thomas\_maurer@fws.gov]; Toby McBride[toby\_mcbride@fws.gov]  
**From:** Deschambault, Lynda  
**Sent:** Wed 2/8/2017 10:45:03 PM  
**Subject:** EPA comments on the Surface Water Summary Report  
[160510 RWQCB Coms on Srfc Wtr Tchnci Data Rprt FINAL.PDF](#)  
[EPAComments on Surface Water 02.08.17.pdf](#)

Dear Mr. Brown,

U. S. Environmental Protection Agency (EPA) has reviewed the March 14, 2016, Surface Water Technical Data Summary Report and Response to U.S. EPA and LRWQCB Comments on the Report titled Evaluation of Historical and RI/FS Surface Water Data, Leviathan Mine Site, Alpine County, California (Summary Report) prepared on behalf of the Atlantic Richfield Company (ARC) by AMEC.

The Summary Report was provided in partial fulfillment of the requirements of the Statement of Work attached to the Administrative Order for Remedial Investigation and Feasibility Study (Unilateral Administrative Order), Comprehensive Environmental Response, Compensation, and Liability Act Docket No. 2008-18 issued by the EPA on June 23, 2008.

Attached also, please find a copy of the May 10, 2016 comments from the Lahontan Regional Water Quality Control Board for your full consideration and response.

Similar to the technical data summary report on the Mine Waste media; on or before December 31, 2017, As part of a draft RI/FS submittal, please fully incorporate these EPA comments and prepare and submit a full complete and final robust Surface Water Characterization chapter in the RI/FS report, and complete the baseline risk assessment for surface water.

As discussed, please also develop the remaining media specific reports (TDSRs) (i.e. Stream Sediment/Floodplain Soil, and Reference) to be responsive and incorporate all of these same EPA comments by June 30, 2017. Within 30 days, ARC should provide a response that it concurs with these comments and will incorporate them as requested. Should ARC find that they disagree, do not concur, or will not incorporate EPA comments, then this should be discussed with EPA immediately to ensure that these submittals in June are satisfactory and approvable. Please ensure these two TDSRs are full complete, responsive and sufficient to act as a template for all other media reports/ chapters for inclusion in a *draft* RI/FS by December 31, 2017.

If you have any questions, please feel free to contact me at (415) 947-4183 or [Deschambault.lynda@epa.gov](mailto:Deschambault.lynda@epa.gov).

Best Regards,

Lynda Deschambault

Environmental Scientist

USEPA Region 09

(415) 947-4183

Please be advised I may have limited access to email , therefore please be patient with any communication delays.